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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 GOLDBERG, J.H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in insp repts
 50-250/93-21 & 50-251/93-21.C/As: licensee revised operating
 procedures to provide better direction on sequential &
 simultaneous performance of sections.

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OCT 14 1993

L-93-249
10 CFR 2.201

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
NRC Inspection Report 93-21

Florida Power & Light Company has reviewed the subject inspection report and, pursuant to 10 CFR 2.201, the required response is attached.

If there are any questions, please contact us.

Very truly yours,

J. H. Goldberg
President
Nuclear Division

JHG/CLM/cm

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Nuclear Plant

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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Inspection Report 93-21

FINDING:

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, revision 2, February 1978.

Item 1.d of Regulatory Guide 1.33, Revision 2, February, 1978, Appendix A, recommends the use of administrative procedures for procedure adherence, and item 3.k of this Appendix recommends the use of procedures for activities involving the energizing, filling, venting, draining, startup, shutdown, and changing modes of operation of the feedwater system (feedwater pumps to steam generator).

Section 5.1 of Administrative Procedure 0-ADM-201, Operations Procedure Usage, requires operating procedures to be performed in a step by step manner with each step being completed prior to the performance of the next step unless exception is allowed by the procedure.

Sections 7.8 and 7.9 of Operating Procedure 4-OP-081.1, Feedwater Heaters, Extraction Steam, Vents, and Drains Valve Alignment, require that the 6A and 6B feedwater heater tube side outlet valves 4-30-123 and 4-30-223, respectively, be opened prior to positioning the 6A and 6B feedwater tube side normal/bypass valves, 4-20-121 and 4-20-221, respectively, to the normal position.

Contrary to the above, on August 16, 1993, 6A and 6B feedwater heater tube side normal/bypass valves 4-20-121 and 4-20-221 (located between the feedwater pumps and the steam generator) were taken to the normal position without having the 6A and 6B feedwater heater tube side outlet valves 4-30-123 and 4-30-223 fully open. This caused a perturbation in the feedwater system which eventually resulted in a reactor trip.

This is a Severity Level IV violation (Supplement 1).



RESPONSE TO FINDING

1. Florida Power & Light Company (FPL) concurs with the finding.
2. Reason for the violation:

The root cause of the event was cognitive error by a non-licensed operator (Turbine Operator), resulting in the procedural non-compliance. The relevant steps of the procedure require that the normal/bypass valves be cracked "open" (off the full-bypass seat), the outlet valves opened, then the normal/bypass valves fully repositioned to normal. The Turbine Operator's knowledge of the operation of the heater tube side normal/bypass valves was deficient. He thought he was "cracking open" these valves as required by the procedure when in fact he was fully opening them. A contributing factor was that an adequate pre-evolution briefing was not conducted, in part because of recent successful performances of the evolution; as a result, the differences between those successful performances and this ultimately unsuccessful performance were not recognized.

3. Corrective steps which have been taken and the results achieved:

The need to perform adequate pre-evolution briefings has been stressed to Control Room supervisors. The briefings will address the need for communication, and the expected plant responses for the actions to be performed. The NPS will determine when briefings are required for each evolution.

The operators involved were counselled in accordance with FPL Nuclear Division policy.

4. The corrective steps which have been taken to avoid further violations:

Operating procedure 4-OP-081.1 has been revised to provide better direction on sequential and/or simultaneous performance of sections. These improvements also have been reflected in the corresponding Unit 3 procedure.



5. Corrective actions which will be taken to prevent further violations:

Licensed and non-licensed operators are being trained on the operation of three-way valves, like those used on the inlets to the high pressure feedwater heaters. This information is being incorporated into the operator regualification training program, and into the system descriptions used to conduct initial training.

Notwithstanding the operator error we have been successful in uprating the design pressure of the heat exchanger such that once the relief valves for the higher pressure are replaced, the lineup that caused the problem can be avoided during routine plant startups. Replacement of the relief valves is being tracked as a corrective action to LER 251-93-003; three of the four have been replaced.

6. The date when full compliance was achieved:

This non-compliance was a discrete activity involving performance of procedural steps out of order. The complete section of the procedure was completed on August 16, 1993. The complete section of the procedure was performed as written on August 17, 1993, thereby demonstrating full compliance with the procedure.

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